



2023-24 Shallow Subsidy Program For all Populations Scope of Required Services (SRS)

This Scope of Required Services (SRS) for the Shallow Subsidy Program (SSP) contains a written summary of, and links to, detailed information regarding the services that must be provided to eligible participants receiving Shallow Subsidy Program services. The Los Angeles Homeless Services Authority (LAHSA) maintains the right to make changes related to requirements for prioritization, matching, and other aspects of the implementation of the complete Coordinated Entry System as well as this SRS and accompanying documents. Any program changes or updates will be noticed to programs through policies, interim guidance, and other forms of communication as LAHSA deems necessary. Any of these notices, will by fact of being sent to the Programs become a part of the Programs' obligations.

SHALLOW SUBSIDY PROGRAM OVERVIEW

The Shallow Subsidy Program (SSP) is a Housing First, trauma-informed program designed to serve as a bridge between Time-Limited Subsidy entry into an affordable unit or voucher program. The Shallow Subsidy provides a fixed-rate monthly rental subsidy to participants who have received Time Limited Subsidy program assistance. By providing a rental subsidy and case management services, the SSP assists households in retaining their current housing by establishing or maintaining mainstream benefits and needed community resources, responding to and resolving concerns raised by current landlords and assisting with and managing enrollment in LA County-wide affordable housing waitlists. Enrollment continues until such time that the participant increases their income beyond eligibility, or the participant receives a placement in a permanent affordable housing unit (or voucher subsidy). SSP works as a part of the LA Coordinated Entry System (CES) by accepting referrals through the CES SPA area teams.



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DEFINITIONS

1. **Time Limited Subsidy Programs (TLS)**: Are a subset of programs that fall underneath the permanent housing portfolio. Formerly referred to as Rapid Rehousing, Recovery Housing, and Shallow Subsidy programs. Time Limited Subsidy programs provide support to households experiencing homelessness by assisting in accessing permanent housing quickly and for a limited amount of time. The amount of time and assistance varies by the specific program.
2. Time Limited Subsidy programs connect families, individuals, and youth experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. TLS is an important component of a community's response to homelessness. A fundamental goal of TLS is to reduce the amount of time a person is homeless by rapidly providing stable and safe housing.
3. **Rent Burden** is the percentage of a household's income that is spent on housing related expenses (rent and utilities). Households spending more than 60% of their income are considered to be "extremely rent burdened" and are usually the persons served by the homelessness system. To calculate the amount of rent burden a household experiences, one takes the full rent amount, including utility expenses, and divides that by the household's gross income. That percentage is the rent burden the household is experiencing.
4. **Progressive Engagement/Assistance** is an approach for providing case management services in permanent housing programs. This approach seeks to provide only the amount of assistance necessary to assist each participant reach housing retention, not more. Progressive Assistance starts when staff first meet their participant and begins the process of assessing the person's strengths and housing barriers. Staff should continually assess how much a participant can do on their own at every meeting.
5. **Warm Hand-off**: When providing participants with referrals to services or other providers, it is important for the program staff person to take an active role in making the referral happen. This trauma-informed approach ensures that the participant is securely connected to the resource. A warm hand-off consists of the staff person making the first approach to the resource to ensure that it is an appropriate referral and learn who exactly the participant should reach out to and/or meet with. Staff should act as a facilitator for ensuring the connection occurs.
6. **Slot-Based Contracting**: In the Slot-Based system of contracting, programs will be awarded funding based on maintaining a certain number of service slots for participant enrollments and services. The awarded funding amount in the Slot-Based system will be determined based on the amount of funding needed to provide the full range of services required by the program model to each enrolled participant. This will include a required caseload ratio and funding to maintain that ratio; funding for rental assistance, move-in costs, security deposits; furnishing, housing search and identification costs including Tenant Screening Reports; as well as administrative costs and other eligible services found in the SRS. While the number of participants will shift over the course of the year, programs are expected to fill open slots as quickly as possible after exiting a participant.
7. **Family**: Households consisting of one or more minor children (17 or under) in physical custody or under the guardianship of one or more adults who are living together. This includes households with same-sex partners, families with intergenerational or extended family members, unmarried couples with children,

families with adults who are not the biological parents of the children, and households without minor children in which one member is pregnant, or a household with a qualified dependent.

8. **Qualified Dependent:** An individual over the age of 18 who is: (a) Incapable of self-sustaining employment by reason of mental or physical disability, and (b) is dependent upon a parent or guardian to attend to the financial needs of an individual as well as an individual’s self-help needs and other activities of daily living for support.

ELIGIBILITY FOR SERVICES

1. Homeless Status:

Participants referred to Shallow Subsidy Program (SSP) must be determined to be homeless (Categories 1, or 4) per HUD’s Final Rule on “defining Homeless” (24 CFR parts 91, 576 and 578). Please see the Appendices for detailed description eligibility for Shallow Subsidy

- 1.1 Programs will be responsible for documenting the determination of the participant’s homelessness status by using the LAHSA approved [LA CoC Homeless Certification Forms](#). If the forms are not in HMIS, when the participant is referred to the Program, the Program is responsible for obtaining all documentation forms from any referring or previous agency assisting the participant or completing the forms themselves. All documentation is required to be placed inside the participant’s master file and uploaded to HMIS. Detailed eligibility requirement for the SSP can be found in [Appendix I](#).

2. CES Initial Assessment:

CES Surveys (CES Survey for Adults, Youth, or Families with Children) are no longer required upon intake. Upon identification of a new or updated CES Initial Assessment tool, contractor will be required to complete all necessary training to implement CES Initial Assessment Tool(s) as part of client intake. Contractor must comply with any forthcoming guidance regarding updating or replacing existing CES Survey Tools.

3. Income Requirements:

The household total income cannot exceed 50% Area Median Income (AMI) for Los Angeles County as defined by HUD which can be found in [MyOrg](#). Or [the HUD AMI tables](#) which are updated annually. If a participant exceeds the 50% AMI at program entry, please contact the LAHSA Coordinator to review limited exceptions.

- 3.1 Programs are responsible for obtaining all income supporting documents. See Appendix VII and VIII for an explanation of the documentation required. If there is a reported increase or decrease in income, Programs must update the income in HMIS or participant file, annually.
- 3.2 If the participant cannot obtain documentation of income or provide proof of income, the Program must complete the required LAHSA eligibility forms found in **Appendix VI**.
- 3.3 If there is a reported increase or decrease in income, program must update the income in HMIS and participant file. It is not required to update income except at annual recertification.
- 3.4 When the annual recertification is completed, if client is found to have income exceeding 80% AMI, the participant is to be exited from the program within 30 days.
- 3.5 If income over AMI is discovered *outside* of the annual recertification, participant remains eligible to receive services until the scheduled annual recertification date. It is at that time, based on participant’s income, where it will be determined if the participant is meeting the AMI eligibility requirements.



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3.6 SSP participants must be experiencing a 60% rent burden or greater. See Appendix I and II for details on how to document eligibility.

4. Provider referral additional requirements:

- 4.1 Providers must determine that a participant is able to afford the rent in combination with the SSP subsidy
- 4.2 Currently active in a LA Continuum of Care TLS Program.
- 4.3 Participant must be current on all rental assistance payments. There must not have any unpaid rental balances.
- 4.4 Prior to being enrolled into the SSP, Participant must have shown the ability to pay 60% or more of their rent.
- 4.5 Referring Providers must ensure participants are either, on or working to get enrolled on, any waitlists for long-term affordable housing resources including but not limited to:
 - 4.5.1 Senior Housing
 - 4.5.2 Affordable Housing
 - 4.5.3 Subsidized Housing
 - 4.5.4 Tax Credit Housing
 - 4.5.5 Any available housing voucher program
 - 4.5.6 Any other affordable housing available in LA County

5. Shallow Subsidy Program additional requirements:

The Shallow Subsidy Program will maintain an updated list of all available affordable housing in LA County and ensure that all enrolled participants are currently enrolled in waitlists as they become “open”. Shallow Subsidy staff will regularly assess and correct participants’ enrollment in an affordable housing waitlist to ensure they contain accurate contact information for the participant including current address, email address and phone number.

6. Required to Serve

SSP providers must accept referrals from participants that may not be eligible for any affordable housing resources. This information must be discussed during case conferencing. Programs must **NOT** establish policies and/or assessments that screen out participants or deny referrals based on any of the following criteria:

- 6.1 Lack of Sobriety;
- 6.2 Those who need assistance with activities of daily living;
- 6.3 Lack of income or employment status;
- 6.4 Lack of identification documentation or legal status;
- 6.5 The presence or perceived presence of mental health issues, disabilities, or other psychosocial challenges;
- 6.6 Lack of a commitment to participate in treatment;
- 6.7 Lack of Tuberculosis test verification or COVID-19 test verifications;
- 6.7 Past program participant or previous stay at program’s facilities;
- 6.8 Service Animal and/or lack of documentation for the service/emotional support animal;
- 6.9 Criminal background;
- 6.10 Presence of or number of evictions;
- 6.11 Any other criteria thought to predict challenges/barriers to long-term housing stability or generally considered “difficult to work with.”

POPULATIONS SERVED—ALL POPULATIONS

1. Shallow Subsidy:

The target populations are individuals, couples, Transition Aged Youth (TAY) and families (see Section I, Definitions) experiencing homelessness. Unaccompanied minors are not eligible for enrollment or services in programs that serve Single Adults. An exemption exists for unaccompanied minors who are legally emancipated.

2. Domestic Violence/Intimate Partner Violence (DV/IPV) TLS:

An individual or head of household in a family that identifies as a DV/IPV survivor or actively or attempting to flee, has no other residence and lacks the resources or support networks to obtain other permanent housing. These are inclusive of men, LGBTQI+ individuals, families with teenage boys, etc. Programs must serve participants with equal opportunity to be served. Unaccompanied minors are not eligible for enrollment or services. An exemption exists for unaccompanied minors who are legally emancipated. Programs must develop and implement policies and procedures to ensure continued confidentiality and privacy of persons who are fleeing or attempting to flee domestic violence, stalking, sexual assault, or human trafficking.

2.1 Programs are also required to work collaboratively with domestic violence programs/shelters to ensure that services are made available to eligible participants of the domestic violence system.

COORDINATED ENTRY SYSTEM PARTICIPATION (CES)

1. Program must identify new participants through participation and collaboration with the Coordinated Entry System (CES).

2. CES Initial Assessment:

CES Surveys (CES Survey for Adults, Youth, or Families with Children) are no longer required upon intake. Upon identification of a new or updated CES Initial Assessment tool, contractor will be required to complete all necessary training to implement CES Initial Assessment Tool(s) as part of client intake. Contractor must comply with any forthcoming guidance regarding updating or replacing existing CES Survey Tools.

3. Program must accept referrals from CES participating agencies operating in the LA Continuum of Care (COC) as a Time Limited Subsidy Program.

4. Program must lead, in collaboration with the CES, ongoing case conferencing to discuss referrals from CES participating agencies.

ENROLLMENT PROCESS

1. Establish Enrollment Policies and Procedures

The Program will establish enrollment policies and procedures and is responsible for ensuring that all CES providers are fully aware of the procedures for referring a participant to the program.

- 1.1 When participants are referred to the Shallow Subsidy Program, it is the responsibility of the Shallow Subsidy Program to coordinate with the participants' current program providers to review and determine participant eligibility.
- 1.2 When participants are referred to the Shallow Subsidy Program, both the referring agency and Shallow Subsidy Program, must conduct a warm hand off to ensure continuity of services are being provided.
- 1.3 Program procedures must include active coordination with the appropriate CES programs who may have eligible participants to refer.
- 1.4 Program is responsible to ensure all proper documentation is received and uploaded to HMIS to confirm document eligibility.

2. Information required from Referring Agency

The Shallow Subsidy Program must collect the following from the referring agency:

- 2.1 Shallow Subsidy Referral Form
- 2.2 Participant Identification
- 2.3 Income Verification
- 2.4 Shallow Subsidy Landlord/Property Management Agreement
- 2.5 Participant Budget
- 2.6 Lease/Rental Agreement
- 2.7 LAHSA Habitability Inspection Documentation
- 2.8 LAHSA Rent Reasonableness Form
- 2.9 Property Owner's W-9
- 2.10 Proof of property ownership

3. Timing of Notice

Within 72 hours of the case conference review, the Shallow Subsidy Program will notify the referring agency staff of the enrollment status of the Participant, the subsidy amount SSP will provide, and when SSP will begin the first rental assistance payment.

- 3.1 The subsidy amount will be based on the lowest amount deemed necessary to stabilize the household, taking into consideration participant's budget, expenses, income, and rental amount.

CASE MANAGEMENT AND HOUSING SUPPORT SERVICES:

1. SSP provides services and assistance either directly, or through subcontracted service arrangements, who must be uniquely assessed for the types of services provided. The services that can be provided are listed below but are not limited to this list. Greater details about eligible services and activities can be found in [Appendix IV and V](#).

2. Direct Support Services:

Programs providing Shallow Subsidy are funded for the following services:

- 2.1 Intake and Enrollment



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- 2.2 Case Management
- 2.3 Financial Assistance

3. No Participant Rejections

Participants must not be rejected or exited from participation due to any unnecessary barriers such as sobriety, income, mental health needs, disabilities, or due to being generally considered “difficult to work with”.

4. Case Management & Supportive Services:

CM and SS are provided by Shallow Subsidy Program staff to assist participants in retaining permanent housing. The primary objective of housing-focused Case Management/Support Services is to extend support to participants, through an individualized case management relationship, that will ultimately translate to increased housing retention.

5. Home Visits:

Staff are required to make at least one home visit every quarter. In the first three months of enrollment in the program, staff must meet more often in order to assess the support services needs of the participants. During the transfer stage, participants may be confused, or increased stress could be felt. Case managers are expected to have a greater degree of contact with them during this time. Once it is determined between the case manager and the participant, that once a quarter will be sufficient to support the participant, home visits or case management visits can scale back to the original schedule.

- 5.1 If Public Health guidance does not allow home visits, then virtual home visits are acceptable and should be logged appropriately in HMIS with identification of the type of meeting that was held. Programs shall increase and decrease the intensity of case management services as needed. This includes increasing the frequency of meetings and home visits as needed.

6. Case Management Ratios:

The Shallow Subsidy Program must maintain a ratio of one (1) case manager to every thirty (30) participants.

- 6.2 In the event that a program loses staff in such a way that it will affect their client to staff ratios, the program must inform their LAHSA Coordinator and work with them to develop an acceptable plan for a temporary increase in caseload ratios. In general, programs will be provided with a three (3) month period in which to replace lost staff. After that time, programs will be expected to lower their caseloads to the original contracted-for level. LAHSA Coordinator will consider all extenuating circumstances and provide extensions and change to these rules on a case-by-case basis, as needed.

7. Progressive Assistance

Case Management services should adhere to a *Progressive Assistance approach to service delivery*. In Progressive Assistance, the case management staff are regularly re-assessing the needs of the participant and adjusting the amount of support as appropriate. Staff will find that the needs may go up and down depending on what the participant is experiencing.

8. Services

Services provided to participants by the Program, or through subcontracted or leveraged partnerships with community partners, must include, but are not limited to, those listed below:



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- 8.1 The Shallow Subsidy Program must maintain information concerning the current housing of referred participants and provide supports to landlords/property managers and participants related to housing retention.
- 8.2 Annual Recertification
An annual recertification in-person meeting must be conducted. This meeting must review and update the participant's goals, review their status on all available affordable housing wait lists; and re-certify eligibility base on their income; and an annual Habitability Inspection. If a participant is found to no longer be eligible, the program shall follow requirements found in the Length of Enrollment/Exiting section of this SRS.
- 8.3 Leases
Program must ensure that the participant's lease follows the LAHSA Rental and Lease Standards found in **Appendix VI**.
- 8.4 Landlord Supports:
Program is responsible for informing the participants' landlords about the Shallow Subsidy Program and gaining their agreement to participant in the program and what to expect from the Program Staff.
 - 8.4.1 Provide landlords/property managers with a clear summary of services, communication protocols, roles, responsibilities, and emergency contact numbers. They must also be provided with a secondary point of contact at the Program to ensure concerns are addressed when the primary contact is not available.
 - 8.4.2 Program must follow the Customer Service Supports for Landlords and Property Managers found in the [LA County RRH Minimum Practice Standards](#).
 - 8.4.3 Program shall regularly and proactively connect with the landlord/property manager or property management to check in and address any concerns that may exist.
 - 8.4.4 Program shall coordinate with landlords and participants for the transition of rental payments before the financial assistance is ended.
 - 7.4.5 Program shall establish a policy that allows for staff to check on rental payments by participants as needed to ensure proper, on-time and full rental payment has been made.

HOUSING SERVICES PLANS

1. Timing of Plans

Case Managers must develop a Housing Services Plan in coordination with the participant within the first three (14) days of enrollment. The Housing and Services Plan will be the road map of services that are to be provided, actions that need to be taken (by both staff and the participant) and referrals that need to be made. Housing Plans summarize the participant's goals, and immediate action steps toward those goals. The Plans are updated as the person's situation changes, and steps are completed or revised. Plans should be simple and short and should be signed by the participant as it is developed and updated. All updates of the plan must be documented in HMIS.



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- 1.1 Continuous Re-Assessment
Housing Plans must be continually re-assessed and updated (at a minimum of quarterly) and more often if needed. All updates must be documented in HMIS or the participant files as appropriate.

2. Activities

Program must assist participants with the following activities that address the stated goals of the participant in the Housing Plan, including but not limited to:

- 2.1 Crisis Intervention
- 2.2 Establishing Mainstream Benefits
- 2.3 Education
- 2.4. Legal Services
- 2.5 Employment Supports
- 2.6. Vocational Services
- 2.7 Credit Counseling & Financial literacy
- 2.8 Accessing affordable housing wait lists
- 2.9 And other needs identified by the participant.

3. Referrals

When a referral is made to any community service, case managers shall provide a warm hand-off and follow-up to ensure the linkage has been made.

FINANCIAL ASSISTANCE

1. Rental Assistance

Program must provide rental assistance in accordance with policies and procedures to the property owner, landlord or other party designated by the owner.

- 1.1 In the Shallow Subsidy Program, the amount of rental assistance is based on a sliding scale (35%-45%) which considers the participant's income and fixed expenses.

2. Policies and Procedures

Program must have policies and procedures that manage the monitoring and coordination of the use and disbursement of financial assistance including: the process for ensuring that all rental assistance payments are timely; that those payments are paid to appropriate parties; and the process for determining the amount of rental assistance that will be provided. This also includes timely and accurate data entry in the LA CoC HMIS system and documentation of financial expenditures in HMIS or the participant file.

- 2.1 No Payments to Participants
Programs will not provide financial assistance directly to any program participant, rather will ensure that landlords, utility providers and other such services are paid directly.
- 2.2 Do Not Create a Lease Violation by Late Payments
Program must manage payment in a manner that does not result in lease violations for the participant or other penalties related to lack of timely payment. Late payments to landlords or other such services could potentially be grounds for termination of the contract.
- 2.3 Documented Property Ownership
Programs must have documented verification of ownership before providing any payment including security deposits or rental assistance. To reduce potential barriers to engaging new



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property owners, LAHSA encourages that programs do not ask for grant deeds or tax records and instead use a data base to confirm ownership. Lease Up handles the verification of ownership, if programs utilize their program.

2.4 Eligible Financial Assistance

All eligible categories of financial assistance can be found in [Appendix V](#).

3. Other Rental Assistance Costs

If a participant enrolled in SSP Programs accrues a balance due to loss of income or other circumstances, the program must consult with LAHSA staff to determine if payment for that rental assistance is available.

3.1 If the participant has accrued arrears after exiting the Program, the participant should be referred to other resources such as Homelessness Prevention or 211.

4. Financial Assistance Extension Requests (FAER)

4.1 The FAER should only be used for the following, but not limited to:

4.1.1 Other unique situations not covered by the SRS,

4.1.2 Other costs not noted in the SRS, only as permitted by funding sources.

4.2 Prior to submitting to LAHSA staff, the request should be reviewed and approved by Program Manager

LENGTH OF ENROLLMENT and PROGRAM EXIT

1. Program Exits

Program may exit participant from the Program in collaboration with the participant, when the following conditions are met:

1.1 Subsidized Units

Participant has received subsidized housing, such housing may include, but not be limited to, Tax Credit Properties, Affordable Housing for Seniors, Affordable Housing for persons with Disabilities, other permanently affordable housing or a Housing Choice Voucher or Emergency Housing Voucher.

1.2 Transferring Programs

If it is determined that the participant will be better served by a Permanent Supportive Housing Program or other program that provides more support than the Shallow Subsidy Program. The Program may refer the participant to a “better-fit” program through the CES SPA process. The Shallow Subsidy program must continue to provide the full range of services to that participant until such time as the participant is fully integrated into the new program and a warm hand-off transition has been accomplished.

1.3 Relocations out of CoC

If participant relocates to another CoC; however, the Program may continue to provide services if it is physically possible to do so (as in a neighboring CoC) and if monthly services can continue to be provided.

1.4 Recertification

If participant utilizes reunification services or self-resolves the housing crisis.

- 1.5 Institutionalization
Participant will be hospitalized or incarcerated for ninety (90) days or more. Programs must provide necessary assistance to ensure the client’s absence does not result in a lease violation.
- 1.6 Income Increase
If participant’s income has increased to over 80% AMI, at annual recertification, an exit plan must be developed in collaboration with the participant.

2. Participant Engagement

Participant engagement is the responsibility of program staff. Staff should always be working to ensure that they are in regular contact with the participant and have established an engaged relationship. If a staff person falls out of contact with a participant and cannot reach them, they must take due diligence to attempt to reconnect. All attempts at reconnection must be documented in HMIS and the participant’s file with date of attempt and the type of outreach conducted. Different approaches to outreach must be demonstrated: phone, email, text, letter through the mail, note left at their unit, etc. A participant can only be terminated from the program for lack of contact after one hundred and twenty (120) days and multiple, demonstrated attempts to reach and talk with the participant by the Program staff.

3. May NOT Exit for Reasons

Program must NOT exit participant from services without the collaboration of the participant due to:

- 3.1. Active substance use.
- 3.2 Non-Compliance with Housing Services Plan.
- 3.3 Active health issues.
- 3.4 Failure to abide by participant budget.
- 3.5 Desire to be assigned another case manager.
- 3.6 Being evicted from the unit.

4. Termination Policies and Procedures

Program may exit (terminate) a participant pursuant to its termination policies and procedures, however, program’s termination policies and procedures must not conflict with any parameters set forth in the [LAHSA Program Standards](#) or Scope of Required Services.

5. May Exit for:

Program may exit (terminate) a participant for the following reasons:

- 5.1 Possession of weapons
- 5.2 Sexual misconduct/assault
- 5.3 Behaviors that are a danger to others
- 5.4 Verbally/physically threatening behaviors
- 5.5 Physical violence to staff and/or other participants
- 5.6 Direct observation of participant engaging in illegal activity on contractor’s site

6. LAHSA Quality Standards Unit

Terminations for other reasons not stated above must be approved by LAHSA’s Quality Standards Unit by either contacting LAHSA’s grievance email: grievances@lahsa.org or contacting the Grievance Hotline: 213-225-8442. Program must have a procedure of how a program participant will be provided a written termination notice, when termination occurs. The Termination notice is a requirement and must contain a clear statement of reason(s) for the termination based on investigated facts.

7. Incident Reports

LAHSA must be notified immediately of incidents that result in injury, any actions of violence, signs of contagious disease, signs of abuse/neglect, death of participants and/or staff, damage/theft to facility and/or property by participants and/or staff, or emergency personnel (fire, first responders, police, sheriff, etc.) being discharged to any and all of the Contractor’s facilities receiving LAHSA funded-homeless services and the resolution of the incident. [LAHSA Incident Report](#).

8. For more information about terminations/exits from a program, see the LAHSA Program Standards section on Terminations Policies and Procedures and the section on Health, Safety, and Incident Reports.

COMMUNITY BASED COLLABORATIVE REQUIREMENTS

1. Program must adhere to the LAHSA Program Standards on Community Based Collaborations.

PERSONNEL

1. If Working with TAY Youth

Program shall ensure that all staff and volunteers that will work with, or come into contact with, transition age youth, children of TAY-headed households, or youth are finger-printed and pass a criminal background (Live Scan) check before working with youth and/or children in the program.

2. Working with Survivors of DV

Program shall ensure that all staff and volunteers that work with, or come into contact with households experiencing or fleeing domestic violence or intimate partner violence meet the definition of “Domestic Violence Counselor” set forth by [California Evidence Code 1037.1](#).

3. Staff Experience and Expertise

Program shall assign enough staff with background experience and expertise to provide the services required in the Scope of Required Services (SRS).

4. Tools for Staff Required

Program shall provide all staff the tools needed to successfully accomplish their work with participants including:

- 4.1 Computers and/or laptops/tablet
- 4.2 Internet connectivity while in the field and working from home
- 4.3 Access to files and email while working remotely
- 4.4 Cell phones
- 4.5 Space where they can have private meetings with participants as needed for privacy

5. For more information about Personnel requirements see the LAHSA Program Standards.

PROGRAM OBLIGATIONS

1. Programs must adhere to the Contractor Obligations found in the [LAHSA Program Standards](#).



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- LA County-wide coordination of the SSP is overseen by LAHSA staff. SSP program staff are required to work with and ensure coordination and standardized operations across all regions in LA County.

EDUCATIONAL REGULATIONS/REQUIREMENTS FOR FAMILIES

- Program must, as required by the McKinney-Vento Act (and as amended by the HEARTH Act) Title IX, Part A of the “Every Student Succeeds Act” (ESSA), demonstrate that they have established education-related policies and practices for minors enrolled in their program. The Program must document education-related policies and practices for program clients, as well as the procedures to ensure compliance.

PARTICIPANT MASTER FILE AND DOCUMENTS

- Program must maintain a file for each participant enrolled that includes, but is not limited, to Core Documents and necessary documentation of Financial Assistance provided to the participant.

Document	Guidance	Required to be uploaded into HMIS
Participant Identification	Required - See Appendix II	Yes
LA CoC Homeless Certification	Required - See LAHSA approved form. See Appendix I	Yes
Income Documentation	Required - See Appendix VII and VIII	No, but required for participant file
Household Composition and Income Eligibility Form	Required - Use LAHSA approved Household Composition and Income Eligibility Calculator on MyOrg. Once completed print out form and place in file.	No, but required for participant file
Proof of Ownership	Must be obtained before any payments are made. Print Out from Property Ownership websites, etc. or a deed of ownership from the owner/landlord will suffice.	No, but required for participant file
Rent Reasonableness Form	Required - See LAHSA approved Rent Reasonableness Form 1652	Yes
W-9 of Landlord	Required - If providing a Security Deposit and/or Rental Assistance. Must be uploaded before any payments are made.	Yes
Financial Assistance Receipts/documents	Required - See Appendix V . Must track all financial assistance in HMIS.	No, but required for participant file
LAHSA Habitability Standards for Permanent Housing Form	Required - See LAHSA approved form 1083 See Appendices VI	Yes



**2023-24 Shallow Subsidy Program
For all Populations
Scope of Required Services (SRS)**

Rental Agreement/Lease	Copy uploaded to HMIS Required for all housing placements (or participant file)	Yes
Grievance Procedure Acknowledgement Form	Agency created form. Must be dated and signed by the participant and Contractor at enrollment	No, but required for participant file
Housing Service Plan	Required- track the date the HSP was completed in HMIS (or participant file) and any updates to the plan. Provider created or LAHSA HSP forms can be used.	Yes
Case Notes	Required: Document every engagement with the participant especially the quarterly (minimum) home visits into HMIS (and participant file)	Yes
Annual Recertification	Required- see LAHSA approved Annual Recertification Form	Yes
Exit Summary in HMIS	Required: Complete exit in HMIS NOT A SEPARATE FORM	Yes
Shallow Subsidy Participant Eligibility Screening	Provided by TLS provider during referral	Yes
Shallow Subsidy Landlord agreement	Provided by TLS provider during referral	Yes

HMIS DATA COLLECTION AND PARTICIPATION REQUIREMENTS

1. Contractor must adhere to the HMIS Data Collection and Participation Requirements found in the LAHSA Program Standards.
2. **Timing of Data Entry**
Data collected from participants including the required data elements identified in the HMIS Data Standard and any subsequent updates must be entered into HMIS within three (3) business days. Exceptions are for projects where the timeframe must be shorter as outlined in the SRS. If/when data is collected on a physical paper form, the data entry policy still applies: The data are to be transferred to HMIS no later than three (3) business days. The usage of paper forms needs to follow the guidelines set forth by the grantor, especially paper forms that include the participant signature or are required to be a part of the master file.
 - 2.1 In the event a participant is transferred into a Shallow Subsidy program having already moved into a permanent housing unit, the participant’s program start date and the Housing Move-in Date will be the same.
3. **Exit Destinations**
Exits must be entered in HMIS and must indicate where the participant is expected to stay after they complete or stop participating in the program. The destination response category must reflect what most closely



2023-24 Shallow Subsidy Program For all Populations Scope of Required Services (SRS)

matches where the participant will be staying after exiting the program. For more details on HMIS responsibilities, see the [LAHSA Program Standards](#).

APPENDIX I. HOMELESSNESS DEFINITIONS

<p>Category 1</p>	<p>Literally Homeless</p>	<ul style="list-style-type: none"> • Written observation by the outreach worker; or • Written referral by another housing or service provider: or • Certification by the individual or head of household seeking assistance stating that s/he/they was living on the streets, in a shelter, another place not meant for human habitation, or a hotel/motel paid for by a homelessness services organization <p><u>Use LA CoC Homeless Certification Form and upload to HMIS</u></p> <ul style="list-style-type: none"> • For individuals exiting an institution (treatment program, jail, prison, hospital)—one of the forms of evidence above and: <ul style="list-style-type: none"> ○ Discharge paperwork or written/oral referrals, or ○ Written record of intake worker’s due diligence to obtain evidence and certification by the individual that exited the institution
<p>Category 4</p>	<p>Fleeing/Attempting to flee DV, IVP, Sexual Assault, or Human Trafficking</p>	<ul style="list-style-type: none"> • For victim services providers: <ul style="list-style-type: none"> ○ An oral statement by the individual or HOH seeking assistance which states: they are fleeing, they have no subsequent residence and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • For Non-Victim services providers <ul style="list-style-type: none"> ○ Oral statement by the individual or HOH seeking assistance that they are fleeing. This statement is documented by a self-certification or by the case worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and ○ Certification by the individual or HOH that no subsequent residence has been identified; and ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
<p>REQUIRED FORMS</p>		<ul style="list-style-type: none"> • LA CoC Homeless Certification Form
<p>Status must be documented in HMIS or participant file</p>		<ul style="list-style-type: none"> • Use the HMIS Client Summary Report or • LA CoC Homeless Certification Forms (above)

APPENDIX II. ELIGIBILITY FOR SHALLOW SUBSIDY

Population Served	Individual Adults, TAY (Youth) and Families
Program Status	Must be currently enrolled in a TLS program or Must be currently enrolled in a Prevention program and be 55+ years old (20% of slots)
Income Threshold	The household total income cannot exceed 50% Area Median Income (AMI) for Los Angeles County. If income exceeds 50% AMI, provider must contact LAHSA Coordinator to discuss limited exceptions.
Rent Burden	The percentage of a household’s income that is spent on housing related expenses (rent and utilities). Households must be spending 60% or more of their income on rent.
Ongoing Eligibility	Participant’s eligibility must be re-evaluated annually to establish: <ul style="list-style-type: none"> ○ Participant does not have annual income greater than 80% of median income ○ See Appendix VII and VIII for Income documentation
Geography	Must be a current resident of LA County

APPENDIX III. ELIGIBILITY INFORMATION

CATEGORY	GUIDANCE
Ongoing Eligibility	<p>Participants' eligibility must be re-evaluated annually</p> <ul style="list-style-type: none"> • to ensure that their income does not exceed 50% AMI for LA County; • And to verify that participants have sufficient resources and support networks necessary to retain housing without assistance and how the Housing Plan be adjusted?
Participant Identification	<ul style="list-style-type: none"> • If a participant does not have identification at the time of program screening, <i>program must not deny enrollment into the program and rather, assist the participant in obtaining whatever ID is needed after enrollment.</i> • Participant must (eventually) have a form of identification on file. • Acceptable forms of ID <ul style="list-style-type: none"> ○ <u>Category A:</u> Acceptable forms of government ID <ul style="list-style-type: none"> ▪ State-issued DMV ID ▪ State-issued DMV driver's license ▪ Passport/Passport Card ▪ US Military ID ▪ Immigration Services ID (USCIS) ▪ Visa issued by the US Depart. Of State ▪ Government issued ID ○ <u>Category B:</u> Alternative photo ID <ul style="list-style-type: none"> ▪ Student ID ▪ Shelter ID ▪ Employment ID ▪ Bank/Debit/Credit Card ▪ Transportation Card (Metro) ▪ Library Card ▪ Gym Membership Card ▪ Warehouse Club Membership Card ○ <u>Category C:</u> Alternative non-photo ID <ul style="list-style-type: none"> ▪ Birth Certificate ▪ Utility Bill ▪ Lease/Rental Contract ▪ School Records ▪ Medical/Dental insurance card ▪ Debit/bank card ▪ Credit Card ▪ Legal records/court document ▪ Tax Identification Number (TIN)/paperwork ▪ Social Security Card ▪ American Automobile Association Card (AAA) ▪ American Association of Retired Persons Card (AARP) <p>IMPORTANT: <i>If the person does not have anything in Category A, they may provide one from Category B AND one from Category C</i></p> <p>A copy of a Social Security Card is not a requirement</p>

	Financial Assistance to the person may not be provided until ID has been obtained.
Income	Participant must be at or below 50% AMI and must be re-evaluated annually as to their income is within this level. Documentation must be placed in HMIS or in participant file if DV/IPV provider
Geography	Household must be a current resident of the County of Los Angeles. If the person reports that they slept within the County geographic boundaries the previous night, they meet the requirement that they are a resident of Los Angeles County.
Veterans	Must not be eligible for Supportive Services for Veterans Families (SSVF) <ul style="list-style-type: none"> • Verification from an SSVF provider that the Veteran has utilized all available SSVF resources or does not qualify for SSVF is required to serve participants.

APPENDIX IV. ELIGIBLE SUPPORTIVE SERVICES

Supportive Services	Guidance
Case Management	<ul style="list-style-type: none"> • Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participant(s), including: • Intake Assessment - Providing ongoing risk assessment and safety planning for survivors of DV/IPV • Housing focused case management • Counseling • Developing, securing, and coordinating services • Obtaining Federal, State, and local benefits • Monitoring and evaluating program participant progress • Providing information and referrals to other providers • Developing an individualized housing and services plan, with a focus on a path to permanent housing • Providing home-based face-to-face services • Support associated with the entire housing search, attainment and move-in process • Conducting required annual assessment of service needs (re-evaluation). • May provide case management up to 6 months after the assistance stops • Must meet with participant at least once per month preferably in their home
Housing Search & Counseling Services	<p>Assist participants in locating, obtaining, and retaining suitable housing, including:</p> <ul style="list-style-type: none"> • Housing search • Tenant counseling • Understanding leases • Arranging for utilities • Making moving arrangements • Mediation with property owners and landlords • Credit counseling, accessing a free personal credit report, and resolving personal credit issues • Payment of rental application fees, Security Deposits and other required fees associated with moving in.

APPENDIX V. ELIGIBLE FINANCIAL ASSISTANCE

Type of Assistance	Guidance	Documentation
Rental Assistance	Provider will pay a sliding scale of 35% to 45% of the monthly rental amount.	<ul style="list-style-type: none"> • Lease Agreement • Landlord W-9 • Proof of Property Ownership • Receipt(s) of payments • Habitability Inspection (See App VII and VII-A)
Security Deposit	Security deposits shall not exceed the equivalent of two (2) month’s rent <ul style="list-style-type: none"> • Allowable only to re-house a participant due to a need to re-house 	<ul style="list-style-type: none"> • Lease Agreement • Landlord W-9 • Proof of Ownership • Inspections (see above) • Receipts
Utility Deposit	Standard deposit required for each needed utility (incl trash Eligible utilities include electric, gas, water, and trash).	Copy of bill or receipt of payment.
Move-In Expenses	<ul style="list-style-type: none"> • Application Fee, Key fee, etc. • Storage Fees (equivalent of three (3) months of storage fee) • Cost of truck rental or hiring a moving service. 	<ul style="list-style-type: none"> • Receipts • Storage: bill reflecting monthly fees paid • Copy of lease

APPENDIX VI. Rental Housing and Lease Standards

	Guidance
Housing Standards	<ul style="list-style-type: none"> • Prior to the issuance of any financial assistance, Program must physically inspect each unit to assure it meets the appropriate inspection by funding (see below). • Units must pass LAHSA Habitability Standards • Housing which fails to meet the standards may not receive assistance, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection. Program must verify that all deficiencies have been corrected.
Fair Market Rent (FMR) & Rent Reasonableness	<ul style="list-style-type: none"> • Units meet HUD’s rent reasonableness standards¹. See 578.51(g) utilizing the LAHSA Rent Reasonableness Form • This standard is designed to ensure that rents being paid are reasonable in relation to those being charged for comparable unassisted units in the same market (within 1 mile of the participant’s unit). Providers must use standardized “Rent Reasonableness” and “Utility Allowance” forms.
Lease Requirements	<ul style="list-style-type: none"> • Lease must be between the owner and the program participant.
Use with Other Subsidies	Financial assistance cannot be provided to a program participant who is receiving financial assistance for housing from federal, state or local source such as a HCV, EHV, Section 8 Voucher, or in a Low-Income Tax Credit Property or other subsidized unit.
Geography	<ul style="list-style-type: none"> • Contractors are permitted to locate housing outside of Los Angeles County if the participant desires to relocate. • A housing inspection (based on funding stream-see above) must be completed and the rent must be “reasonable” • Housing Retention Plan documents show relocating outside of Los Angeles County will ultimately result in the participant achieving housing retention. If participant needs ongoing financial assistance and supportive services, contractor must arrange to provide these services; if it is reasonably possible. • geographic distance cannot be a barrier towards providing supportive services unless it is impossible to provide services remotely, monthly in-person meetings are still required unless a Public Health Emergency requires remote work. • If the participant does not need ongoing assistance after entering permanent housing, contractor can provide financial assistance. • If contractor assesses the needs of the participant and determines that that the contractor cannot meet the needs of the participant if ongoing assistance is needed, contractor must link the participant to another program in the CoC to which participant is seeking residence prior to the participant entering permanent housing.
Lead Based Paint Remediation and Disclosure	<ul style="list-style-type: none"> • Program staff will provide participant with the approved EPA lead-based paint informational brochure before lease signing. Link to the brochure
Written Standards	<p>Recipients and subrecipients must develop and implement written policies and procedures for:</p> <ul style="list-style-type: none"> • Determining and prioritizing which eligible participants will receive RRH assistance. • Determining the amount or percentage of rent and utilities each program participants must pay. • Determining how long a program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time. • <i>Program must not create policies that are more stringent the LA COC policies</i>

APPENDIX VII. Determining Participant Income-Inclusions

INCOME INCLUSIONS	
<p>The following types of income must be counted when calculating annual income for purposes of determining eligibility for this program.</p> <p><u>Note: If the participant is unable to provide income documentation the participant can complete Self Declaration of Income/ No Income Form. Program must continue to work with the participant to obtain income documentation.</u></p>	
GENERAL CATEGORY	DESCRIPTION
Earned Income	The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
Self- Employment/Business Income	The net income from operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness must not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the household.
Interest & Dividend Income	Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness must not be used as a deduction in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income must include the greater of the actual income derived from net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.
Pension/Retirement Income	The full number of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, lotteries, disability or death benefits, and other similar types of periodic receipts, including a lump-sum payment for the delayed start of a periodic payment (but see No. 8 under Income Exclusions) (e.g., SSDI).
Unemployment & Disability Income	Payments in lieu of earnings, such as unemployment, worker's compensation, and severance pay (but see No. 3 under Income Exclusions).
Alimony and Child Support Income	Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing in the dwelling.
TANF/ Public Assistance	<ol style="list-style-type: none"> 1. TANF/Public assistance received by the household. 2. The amount of reduced TANF/Public assistance income that is disregarded specifically because the household engaged in fraud or failed to comply with an economic self-sufficiency or work activities requirement.
Armed Forces Income	All regular pay, special pay, and allowances from the Armed Forces (whether or not living in the dwelling) who is head of household, spouse, or other person whose dependents are residing in the unit. (See income exclusions for some of these)
G.I. Bill Housing Stipend	The monthly housing stipend received by a Veteran from VA while they are attending school under the G.I. Bill.

APPENDIX VIII. Determining Participant Income-Exclusions

INCOME EXCLUSIONS The following <i>types of income are not counted</i> when calculating annual income for purposes of determining eligibility: All funding streams	
GENERAL CATEGORY	DESCRIPTION
Inheritance and Insurance Income	Lump-sum additions to the participants assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in Income Inclusions).
Earned Income of Children	Earned income from employment of household members under the age of 18 years (including foster children).
Income from Foster Care	Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the tenant family, who are unable to live alone).
Medical Expense Reimbursements	Amounts received by the individual that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
Income of Live- in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution. Note: <i>includes G.I. Bill Student Financial Aid.</i>
Armed Forces Hostile Fire Pay	The special pay to an individual serving in the Armed Forces who is exposed to hostile fire.
Various "Self-Sufficiency" Program Incomes	<ul style="list-style-type: none"> • Amounts received under training programs funded by HUD. • Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS). • Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, etc.) and which are made solely to allow participation in a specific program. • Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time. • Incremental earnings from participation in qualifying state or local employment training programs (including training not affiliated with a local government) or as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the participant is active in the employment training program.
Temporary Income	Temporary, non- recurring, or sporadic income (including gifts).

Reparation payments	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by person who were persecuted during the Nazi era. E.g., payments by German and Japanese governments for atrocities committed during the Nazi era.
Full Time Student Exclusion	Earnings in excess of \$480 for each full-time student 18 years or older (excluding the head of household or spouse).
Social Security & Supplemental Security Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
Income Tax and Property Tax Refunds	Amounts received by the individual in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
Developmental Disability	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the person at home.
VA Disability Compensation Income	Deferred periodic amounts from VA Disability Compensation (Service-Connected Benefits) that are received in a lump sum amount or in prospective monthly amounts.
Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.
Other Exclusions as of 12/31/21	<p>Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary.</p> <p>This currently includes:</p> <ul style="list-style-type: none"> • The value of the allotment of Food Stamps • Payments made under youthful offender incarceration alternatives or senior companions); • Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626[c]) • Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624[f]); • Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. (g) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L94-540, 90 Stat. 2503-04); • The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408); • Amounts of scholarships funded under title IV of the Higher Education Act of 1965, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu);

	<ul style="list-style-type: none"> • Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056[f]), e.g., Green Thumb, Senior Aides, Older American Community Service Employment Program; • Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in In Re Agent-product liability litigation, M.D.L. No. 381 (E.D.N.Y.); • The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q); • Earned income tax credit (EITC) refund payments received on or after January 1, 1991, including advanced earned income credit payments (26 U.S.C. 32[j]); • Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433); • Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637[d]) • Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran (38 U.S.C. 1805); • Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602); and • Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998 (29 U.S.C. 2931) • COVID-19 Unemployment Supplemental • CARE Act Economic Impact Payments
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